



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

March 7, 2017

Mr. Stuart Spencer
Associate Director
Office of Air Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Dear Mr. Spencer:

This letter follows the overall programmatic mid-year review of the ADEQ's Clean Air Act: Sec. 103 (CAA) – Particulate Matter (PM_{2.5}) Monitoring Network program. This review documents the state's progress toward meeting the negotiated 2016 workplan commitments in the Arkansas CAA, Sect. 103 Cooperative Agreement, as jointly reported by your staff and the U.S. Environmental Protection Agency (EPA) Region 6.

EPA appreciates:

- ADEQ's efforts to perform timely AQS reporting of ambient air data and QA/QC activities.
- ADEQ's efforts to coordinate on network performance assessments.
- ADEQ's efforts to maintain the infrastructure needed for the monitor network.
- ADEQ's efforts to maintain the infrastructure needed for the analysis of filter samples from the monitor network.

EPA acknowledges:

- ADEQ's continued willingness to be prepared to maintain communications between our agencies.

We commend you and your staff for your hard work and commitment to protecting the air for the people of Arkansas. We sincerely appreciate your contribution to clean air goals and look forward to continue successfully partnering with ADEQ.

If you have any questions after reviewing the enclosures, please call me at (214) 665-7548.

Sincerely,

A handwritten signature in blue ink, appearing to read "Guy Donaldson", is positioned above the typed name.

Guy Donaldson
Associate Director for Air
Multimedia Division

Enclosures

ADEQ PM_{2.5} Monitoring Network Implementation

Clean Air Act Sec: 103 (CAA) – Particulate Matter (PM) 2.5
2016 Midyear Report for PM-01F19101

Activity	Deliverable
<p>1. The State will notify the EPA Region 6 Air Quality Analysis Section Chief (6PD-Q), by letter, at least 30 days prior to establishing, modifying, relocating or discontinuing any air monitor and/or site.</p> <p>ADEQ: Requests submitted within timeframe.</p> <p>EPA: While no PM_{2.5} monitor network changes occurred from June thru Nov 2016, EPA appreciates ADEQ's willingness to be prepared to maintain communications between our agencies. Please note that the EPA Region 6 Section name has changed from Air Quality Analysis to Air Monitoring and Grants.</p>	Letter or email
<p>2. The State will submit an updated Quality Assurance Project Plan (QAPP) for PM_{2.5} and PM_{2.5} speciation.</p> <p>ADEQ: Submitted on time and approved.</p> <p>EPA: On Nov 1, 2016, EPA approved the ADEQ updated QAPP (Q Trak 17-021) which includes PM_{2.5} ambient air monitoring. The national update to the Field QAPP for PM_{2.5} speciation is under review by EPA OAQPS but in the meantime the June 2012 version (EPA 454 B 12 003) is being used. Please note that the EPA Region 6 Section name has changed from Air Quality Analysis to Air Monitoring and Grants.</p>	QAPP
<p>3. PM_{2.5} monitoring sites will report 75% or greater data return each quarter. If less than the required 75% data return is achieved, the granted will provide a report by letter or e-mail, to Region 6 Air Quality Analysis Section Chief, which explains the reasons for excessive data loss and any corrective action taken.</p> <p>ADEQ: Data capture rate greater than 75%/quarter.</p> <p>EPA: AQS shows that for the period June thru Nov 2016, all 12 NAAQS comparable (parameter 88101) PM_{2.5} monitors ADEQ manages in Arkansas had 75% or greater quarterly data completeness.</p>	Letter or e-mail
<p>4. The State will operate a total of 12 routine PM_{2.5} sites; 11 of the 12 sites will be run on each third day and the other 1 will run each day.</p> <p>ADEQ: Ongoing.</p> <p>EPA: AQS shows that, for the period June thru Nov 2016, of the 12 NAAQS comparable PM_{2.5} monitors</p>	AQS data submittal

ADEQ PM_{2.5} Monitoring Network Implementation

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2016 Midyear Report for PM-01F19101

Activity	Deliverable
ADEQ manages, 9 operate on every third day, 1 operates daily, and 2 operates every 12 th day. The 13 th PM _{2.5} monitor is managed in Oklahoma by ADEQ and operates every third day.	
<p>5. At the end of each calendar year, the grantee will provide to Region 6 Air Quality Analysis Section Chief in writing or e-mail a listing of PM_{2.5} sites which had two or more quarters which did not attain the 75% quarterly data completeness criteria. This report should also fully explain the corrective action taken to remedy the problem and the effectiveness of such action</p> <p>ADEQ: All quarters had 75% or greater data capture rate.</p> <p>EPA: For the period June thru Nov 2016, this communication from ADEQ to EPA was not needed. EPA appreciates ADEQ's willingness to be prepared to maintain communications between our agencies. Please note that the EPA Region 6 Section name has changed from Air Quality Analysis to Air Monitoring and Grants.</p>	Letter or e-mail
<p>6. The State will enter data from the PM_{2.5} network into the EPA Air Quality System (AQS) database within 90 days after the end of each calendar quarter. This data includes PM_{2.5} data, flags associated with ambient air quality data, and precision and accuracy information resulting from required QA/QC activities. If PM_{2.5} data submission to AQS will be delayed beyond the 90-day deadline, the State will advise the Region 6 Air Quality Analysis Section Chief in writing or by e-mail of the delay and when submission is expected.</p> <p>ADEQ: Timeframe met.</p> <p>EPA: EPA appreciates ADEQ's efforts to perform timely AQS reporting of ambient air data and QA/QC activities. EPA reminds ADEQ that as of April 27, 2016 (81 FR 17248, March 28, 2016), Flow Rate Verification QA assessment activities are to be submitted to AQS. The 40 CFR 58 Appendix A Section 3 language was revised to eliminate the Flow Rate Verification exception. Please note that the EPA Region 6 Section name has changed from Air Quality Analysis to Air Monitoring and Grants.</p>	AQS data submittal
7. The ADEQ and the EPA will assess the performance of the PM _{2.5} monitoring program at least annually, either by telephone conference call or in an onsite review.	Conference Call

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Activity	Deliverable
ADEQ: TSA performed in November.	
EPA: EPA appreciates ADEQ's efforts to coordinate on network performance assessments.	
8. The State will notify the EPA Region 6 in writing of any situation (such as monitor malfunction or data validation issue) that results in the loss of more than two consecutive 24-hour PM _{2.5} samples or 120 consecutive hours of continuous PM data. In the written notification, the State will identify the corrective action to take to minimize the data loss.	Letter
ADEQ: On-going.	
EPA: For the period June thru Nov 2016, this communication from ADEQ to EPA was not needed. EPA appreciates ADEQ's willingness to be prepared to maintain communications between our agencies.	
9. Make modifications, as needed, to the NCORE site so that the site structure/s is safe for the physical operation and maintenance of the samplers.	
ADEQ: No modifications needed at the present.	
EPA: EPA appreciates ADEQ's efforts to maintain the infrastructure needed for the monitor network.	
10. Purchase the remainder of the equipment for the operation of the NCORE site.	As-needed or scheduled
ADEQ: On-going, as needed.	
EPA: ADEQ's willingness to operate the NCORE site is appreciated.	
11. Maintain, service, and repair the ADEQ lab that supports the PM _{2.5} network.	As-needed or scheduled
ADEQ: On-going, as needed.	
EPA: EPA appreciates ADEQ's efforts to maintain the infrastructure needed for the analysis of filter samples from the monitor network.	
12. Maintain, operate, service, and repair the ADEQ lab that supports the PM _{2.5} network.	As-needed or scheduled

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<p>ADEQ: On-going, as needed.</p> <p>EPA: EPA appreciates ADEQ's efforts to maintain the infrastructure needed for the analysis of filter samples from the monitor network.</p>	
<p>13. Attend the Region 6 Air Monitoring Meeting.</p> <p>ADEQ: As scheduled.</p> <p>EPA: For the period June thru Nov 2016, this communication from ADEQ to EPA was not needed. EPA appreciates ADEQ's willingness to be prepared to maintain communications between our agencies.</p>	As Scheduled